

Hearing Date: December 16, 2008 at 10:00 a.m. (prevailing Eastern Time)  
Objection Deadline: December 12, 2008 at 4:00 p.m. (prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |        |                                |
|---|--------|--------------------------------|
|   | -----X |                                |
|   | :      |                                |
| <b>In re</b>                                  | :      | <b>Chapter 11</b>              |
|   | :      |                                |
| <b>LEHMAN BROTHERS HOLDINGS, INC., et al.</b> | :      | <b>Case No. 08-13555 (JMP)</b> |
|   | :      |                                |
| <b>Debtors.</b>                               | :      | <b>(Jointly Administered)</b>  |
|   | :      |                                |
|   | -----X |                                |

**NOTICE OF MOTION OF THE PENNSYLVANIA CONVENTION  
CENTER AUTHORITY FOR: (A) DETERMINATION THAT AUTOMATIC  
STAY DOES NOT PREVENT TERMINATION OF RESERVE FUND  
AGREEMENT; OR (B) IN THE ALTERNATIVE, RELIEF FROM THE  
AUTOMATIC STAY TO TERMINATE RESERVE FUND AGREEMENT**

PLEASE TAKE NOTICE that a hearing on the annexed Motion of The Pennsylvania Convention Center Authority (the "Authority") For: (A) Determination That Automatic Stay Does Not Prevent Termination of Reserve Fund Agreement or (b) In The Alternative, For Relief From the Automatic Stay to Terminate Reserve Fund Agreement (the "Motion"), all as more fully described in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Custom House,

One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”) on **December 16, 2008 at 10:00 a.m. (Prevailing Eastern Time)** (the “Hearing”).

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court in accordance with General Order M-242 (available at [www.nysb.uscourts.gov/orders/orders2.html](http://www.nysb.uscourts.gov/orders/orders2.html)) by registered users of the Bankruptcy Court’s filing system and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the Chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Lori R. Fife, Esq., attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”), 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004, Attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin and Tracy Hope Davis; (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq. and Evan Fleck, Esq., attorneys for the official committee of unsecured creditors appointed in these cases; (v) Cleary Gottlieb LLP, One Liberty Plaza, New York, New York 10006, Attn: Lindsee P. Granfield, Esq. and Lisa Schweiger, Esq., and Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Robinson B. Lacy, Esq. and Hydee R. Feldstein, Esq., attorneys for the Debtor’s postpetition lenders; (vi) Saul Ewing LLP, Centre Square West, 1500 Market

Street, 38th Floor, Philadelphia, PA 19102, Attn: Adam H. Isenberg, Esq., attorneys for The Pennsylvania Convention Center Authority; and (vii) any other person or entity with a particularized interest in the Motion, so as to be received no later than **December 12, 2008 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: November 26, 2008  
Philadelphia, PA

SAUL EWING LLP

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